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7
8 IN THE UNITED STATES DISTRICT COURT
9
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RAMON MALDONADO, JR.,

15 Defendant.

CASE NO. 1:23-CR-169 JLT-SKO

16 STIPULATION AND ORDER REGARDING
17 EXCLUDABLE TIME PERIODS UNDER SPEEDY
18 TRIAL ACT

19 DATE: August 21, 2024

20 TIME: 1:00 p.m.

21 COURT: Hon. Sheila K. Oberto

16 STIPULATION

17 1. By previous order, this matter was set for status on August 21, 2024.

18 2. By this stipulation, defendants now move to vacate the status conference and set the
19 matter for a change of plea on September 30, 2024, and to exclude time between August 21, 2024, and
20 September 30, 2024, under Local Code T4.

21 3. The parties agree and stipulate, and request that the Court find the following:

22 a) Counsel for defendant MALDONADO desires additional time to review the plea
23 agreement with the defendant.

24 b) Counsel for defendant believes that failure to grant the above-requested
25 continuance would deny him the reasonable time necessary for effective preparation, taking into
26 account the exercise of due diligence.

27 c) The government does not object to the continuance.

28 d) Based on the above-stated findings, the ends of justice served by continuing the

1 case as requested outweigh the interest of the public and the defendant in a trial within the
2 original date prescribed by the Speedy Trial Act.

3 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
4 et seq., within which trial must commence, the time period of August 21, 2024 to September 30,
5 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
6 T4] because it results from a continuance granted by the Court at defendant's request on the basis
7 of the Court's finding that the ends of justice served by taking such action outweigh the best
8 interest of the public and the defendant in a speedy trial.

9 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
10 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
11 must commence.

12 IT IS SO STIPULATED.

13 Dated: August 13, 2024

14 PHILLIP A. TALBERT
United States Attorney

15 _____
16 /s/ KAREN A. ESCOBAR
17 KAREN A. ESCOBAR
Assistant United States Attorney

18 Dated: August 13, 2024

19 _____
20 /s/ Alekxia L. Torres Stalling
Alekxia L. Torres Stalling
Counsel for Defendant
Ramon Maldonado, Jr.

21 **ORDER**

22 The parties' request for vacating the status conference pending the filing of a plea agreement is
23 DENIED. The parties may renew their request after the plea agreement has been signed and filed.

24 IT IS SO ORDERED.

25 Dated: August 14, 2024

26 _____
27 /s/ *Sheila K. Oberto*

28 UNITED STATES MAGISTRATE JUDGE